

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

INDECK KEYSTONE
ENERGY, LLC, a Delaware limited liability
company,

Plaintiff,

v.

VICTORY ENERGY
OPERATIONS, LLC, a Delaware limited
liability company,

Defendant.

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: CIVIL ACTION
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: NO. 04-CV-325 (ERIE)
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: Judge Sean J. McLaughlin
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PLAINTIFF'S PROPOSED VOIR DIRE

Plaintiff Indeck Keystone Energy, LLC ("IKE"), by and through its undersigned counsel, requests that in addition to those questions set forth in LR 47.1, the Court ask the following questions to each venire member:

1. Have you or any of your family members ever been employed by Erie Power Technologies, Inc.?
2. Have you or any of your family members ever been employed by Zurn Industries?
3. Have you or any of your family members ever been employed by Aalborg Industries?
4. Have you or any of your family members ever been employed by Erie City Iron Works?
5. Have you or any of your family members ever worked with industrial boilers?

6. What is your present occupation?
7. Who is your employer?
8. Do you know any of the following persons who may testify at this trial?
 - a) Steve Bernatowicz
 - b) Shawn Brewer
 - c) David Briggs
 - d) Alan Christian
 - e) Joseph Durante
 - f) Mary Eudy
 - g) Marie Fiske
 - h) Theodore C. Furhman, Jr.
 - i) Robert J. Gdaniec
 - j) Stephen Kang
 - k) Caspar F. Kovarick
 - l) Paul A. Kempf
 - m) Daniel Levstek
 - n) William F. Liebel
 - o) Carl Logan
 - p) Jay McConaughy
 - q) Paul F. Miller
 - r) Trent Miller
 - s) Ian Milligan
 - t) Jere Niminski
 - u) Terrence Pawlowski
 - v) Christos Petcos
 - w) Robert V. Seibel
 - x) Scott A. Stringer
 - y) Martin R. Swabb
 - z) James Hunter Tighe
 - aa) John Viskup
 - bb) Mark White
8. Other than what you have heard here today, do you have any additional information or knowledge concerning the parties, the witnesses, this case in general or any specialized knowledge of industrial boilers, and if so, what information or knowledge do you have?
9. Is there anything that the attorneys should know that might prevent you from being wholly impartial in the trial of this matter?

Respectfully submitted,

/s/ John K. Gisleson

John K. Gisleson (Pa. ID. No. 62511)
Robert J. Williams (Pa. ID. No. 76139)
Jennifer A. Callery (Pa. ID. No. 91421)
SCHNADER HARRISON SEGAL &
LEWIS LLP
Fifth Avenue Place
120 Fifth Avenue, Suite 2700
Pittsburgh, PA 15222-3001
Telephone: 412-577-5200
Facsimile: 412-765-3858

Gerald F. DeNotto
600 North Buffalo Grove Road, Suite 300
Buffalo Grove, IL 60089
Telephone: 847-520-3212
Facsimile: 847-520-3235

*Attorneys for Plaintiff and Counterclaim
Defendant, Indeck Keystone Energy, LLC*

Dated: May 4, 2007